

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

PAUL COLLINS

No. 20 CR 482

Judge Elaine E. Bucklo

AGREED MOTION FOR EARLY RETURN OF TRIAL SUBPOENAS

Pursuant to Fed. R. Crim. P. 17(c)(1), the United States of America, by JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, moves for the entry of an order allowing early return of trial subpoenas, without objection from defense counsel, Michael I. Leonard, representing defendant Paul Collins, and in support thereof states as follows:

1. The Information in this case charges the defendant with one count of wire fraud, in violation of Title 18, United States Code, Section 1343.
2. Rule 17(c)(1) provides that trial subpoenas may be issued to obtain documents and other materials, and that the court may direct witnesses to produce the subpoenaed materials prior to trial.
3. The government respectfully requests that the Court issue an order authorizing all parties to obtain the early return of trial subpoenas, with reciprocal discovery of the materials obtained pursuant to the issuance of the trial subpoenas.
4. Defense counsel has no objection to this motion.

5. Obtaining documents prior to trial may ultimately save time by allowing the parties to review subpoenaed materials in a timely fashion, and may help to avoid delay and surprise.

WHEREFORE, the government respectfully moves this Court to enter an order authorizing all parties to obtain early return of trial subpoenas, with reciprocal discovery of any subpoenaed materials that are obtained.

Respectfully submitted,

JOHN R. LAUSCH, JR.  
United States Attorney

By: s/ Jacqueline Stern  
JACQUELINE STERN  
Assistant U.S. Attorney  
219 South Dearborn St., Rm. 500  
Chicago, Illinois 60604  
(312) 353-5329